



REPLY TO  
ATTENTION OF

**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, U.S. ARMY MATERIEL COMMAND  
9301 CHAPEK ROAD, FORT BELVOIR, VA 22060-5527

AMCPE-SF

14 December 2004

**MEMORANDUM FOR**

Director, US Army Chemical Materials Agency, (AMSCM-RDS), 5183 Blackhawk Road,  
Aberdeen Proving Ground, MD 21010-5424

Commander, U.S. Army Research, Development, and Engineering Command, ATTN: AMSRD-  
MSF, 5183 Blackhawk Road, Aberdeen Proving Ground, MD 21010-5424

**SUBJECT:** Interim AMC Supplemental Guidance for Revised Airborne Exposure Limits for  
GB, GA, GF, VX, H, HD, and HT

1. Reference memorandum, Headquarters, Department of the Army (HQDA), Office of the Assistant Secretary of the Army (Installations and Environment), (OASA I&E), 18 June 2004, subject: Implementation Guidance Policy for New Airborne Exposures Limits for GB, GA, GD, GF, VX, H, HD, and HT.
2. The supplemental guidance for implementing the referenced memorandum within Army Materiel Command is enclosed.
3. Add this supplemental guidance to each paragraph in the enclosure to the referenced memorandum as outlined in the enclosure to this memorandum.
4. The point of contact is Ms. Stephanie Christie, DSN 656-8710, fax 656-8863, commercial 703-806-8710, email [christies@hqamc.army.mil](mailto:christies@hqamc.army.mil).

**FOR THE COMMANDER:**

  
DONALD A. PITTENGER  
Chief  
Safety Office

CF:  
AMCOPS-SSO AMCIG  
AMCCC  
AMCCB

**Interim AMC Supplement to the 18 June 2004, DA OASA(I&E) Implementation Guidance Policy for Revised Airborne Exposure Limits for GB, GA, GD, GF, VX, H, HD, and HT**

- 1. Purpose. Add as paragraph 1c:** To provide additional clarification on implementation of the revised Airborne Exposure Limits and related requirements for operations within Army Materiel Command (AMC).
- 2. References. Add as paragraph 2e:** Memorandum, DA OASA(I&E) Implementation Guidance Policy for Revised Airborne Exposure Limits for GB, GA, GC, GF, VX, H, HD, and HT, 18 June 2004.
- 3. Applicability. Add as paragraph 3b:** This supplement is applicable to all AMC organizations. **Add as paragraph 3c:** This guidance also applies to contractors performing chemical agent operations under AMC organization oversight when incorporated into their contracts.
- 4. Implementation Date. Add as paragraph 4d:** If an organization, to include any demilitarization facility, cannot meet the implementation dates as required by the referenced memorandum, an Implementation Plan will be submitted through AMC to DA OASA (I&E) as discussed in paragraph 4c.
- 5. Revised Airborne Exposure Limits Information. No Change.**
- 6. Chemical Agent Monitoring Requirements.**
  - a. Add to paragraph 6a:** For RDECOM COCO operations, “agency approved site specific quality assurance program” is a program approved within the contractor company or corporation.
- 7. Excursion of WPL.**
  - a. Add to paragraph 7c:** The Notice of Excursion shall be posted for three days, or if the condition leading to the excursion is identified, until that condition is abated, whichever is later.
  - b. Add to paragraph 7e:** The excursion response plan will include a list of the organizations notified when an excursion occurs. Excursion response plan will be approved at the same level as each individual site’s standard operating procedures. This plan may be incorporated into other site response documents.
  - c. Add as paragraph 7f:** Instances of excursions will be reviewed or analyzed at least annually to determine any trends. This will be done at the organization level.

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**8. M40 Series, Chemical Biological Gas Mask Application.**

- a. **Add to paragraph 8a:** Industrial operation is defined as a chemical agent operation in an industrial setting. The M40 should not be used for protection against industrial chemicals.
- b. **Add to paragraph 8b:** For H series agents the M40 mask will not be used for routine respiratory protection above the WPL or in the absence of WPL monitoring. However, the M40 mask may be used for escape from environments above the STEL.
- c. **Add to paragraph 8c:** For H series agents the M40 mask will not be used for routine respiratory protection above the WPL or in the absence of WPL monitoring. However, the M40 mask may be used for escape from environments above the STEL.
- d. **Add to paragraph 8f:** Industrial operation is defined as a chemical agent operation in an industrial setting. The M40 should not be used for protection against industrial chemicals.
- e. **Add as paragraph 8g:** This guidance does not affect the previous DA approval of commercial equipment for chemical agent operations.

**9. Chemical Event Categories for Airborne Exposures to Personnel.**

- a. **Add as paragraph 9d:** RDECOM and CMA will provide or assure that lessons learned are shared within their organization.
- b. **Add as paragraph 9e:** Information from chemical events will be analyzed and should be trended at least annually.
- c. **Add as paragraph 9f:** HQAMC will share lessons learned between AMC Major Subordinate Commands, and also forward lessons learned with broader applicability to DASAF for their distribution.

**10. Decontamination of Personnel upon Egress from Agent Operating Areas. No Change.**

**11. Decontamination and Disposal of Tools, Supplies, Equipment and Facilities.**

- a. **Add to paragraph 11.a:**
  - (3) Where the X criteria is referred to in existing permits.

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- (4) If there is a common terminology with the environmental regulators, the X terminology may still be used in future permit language.

**b. Add as paragraph 11.d:**

11.d (4)– Internal Control of decontaminated items.

11.d (4) (a) If items are always cleared to an unrestricted clean level before removal from an agent area, then no additional requirements are needed. If the items can be considered unrestricted clean (5X or 0), then it does not automatically need to be marked or tagged. If there is a potential to mix different levels of clean items or to mix contaminated and clean items, then the system needs to prevent the possibility of an item being released to an inappropriate group. Options include a marking or tagging system. Tags or marking would not be required if the items are stored in an area that is segregated, controlled and labeled. For instance, tools or equipment in an exclusion area, hood or glove box need not be marked until removed from that area and placed in an uncontrolled area.

11. d (4)(b) Information that needs to be documented on a tag or other method (such as an inventory based on serial numbers) to effectively track and control these materials. This does not include waste:

- Date Decontaminated
- Degree of Decontamination (X terminology)
- Description of Item
- Name of contaminate(s)
- Specific Instructions, additional information to include:
  - (1) Restriction and handling
  - (2) Decontamination Method
  - (3) Monitoring method (e.g. headspace, extraction, surface wipes)
  - (4) Monitoring results
- Person responsible for establishing decontamination classification level

11.d (4)(c) DA does not prescribe a standard marking scheme. The following table is the classification for decontamination levels to be used within AMC. ( Note, decontamination levels are not defined by screening methodology. They are defined by the population to whom the item is being released)

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Classification Level <sup>(1)</sup>	Decontamination Criteria	Vapor Screening Level (concentration value – mg/m3)	Health Based/Risk Analysis <sup>(2)</sup>
Contaminated – Do Not Release; specific safeguards required	X	≥ STEL	No
Release to Agent Workers Clean - Restricted	XXX	< STEL	Yes
Release to Non-agent Workers Clean – Restricted	XXXX	<WPL <sup>(3)(4)</sup>	Yes
Unrestricted release to Public (Clean - Unrestricted)	XXXXX	<GPL <sup>(4)</sup>	Yes
Never contaminated (Clean)	0	N/A	Yes

(1) Restrictions may include requirements that preclude disassembly or applying heating, or friction (such as grinding) without special controls

(2) Health- Based Criteria/Risk Analysis allows for other methods to be used or developed to determine which classification level applies.

(3) Restricted - Maintenance or disassembly of items will only be done by personnel knowledgeable in agent symptoms and characteristics, and in facilities equipped with appropriate safeguards to control potential hazards. Unrestricted - Items have been previously disassembled and is cleaned so that it can be released to the worker population level without risk of agent release.

(4) Release must be IAW approved decontamination plan.

c. **Add new paragraph 11. d(5):** Explosives contaminated tools, supplies, equipment and facilities.

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- (1) Items that have been explosively contaminated will still use the 0, X, XXX, and XXXXX designations for explosive decontamination as defined in TB 700-4.
- (2) Where there is a difference between decontamination levels, both classifications need to be listed, but distinguished between the two.

d. **Add as paragraph 11e(3):** The intent of the WPL monitoring plan is to describe how the facility will be monitored prior to release of the facility for general worker use. The WPL monitoring plan will describe the intended use of the building and the monitoring strategy for release of the facility. This includes the criteria for cessation of monitoring. If the facility is being exchanged between different organizations, then the WPL monitoring plan for the facility shall be approved by the mission commander/manager releasing the facility and the commander/manager receiving the facility. The mission commander is considered the organization commander or the director. For RDECOM COCO operations, mission commander will be a responsible individual within the contractor company or corporation.

e. **Add as paragraph 11g (3):** The mission commander is considered the organization commander or the director. For RDECOM COCO operations, mission commander will be a responsible individual within the contractor company or corporation.

**12. Handling of PPE for Laundering. Add to paragraph 12a:** The definition of clean for PPE is the same as for tools. (reference, paragraph 11c)

**13. Chemical Agent Site Plans and Safety Submissions. No change.**

**14. Shipment of Environmental Samples. Add, at the beginning of the paragraph:** This paragraph applies when samples are sent to a non-surety, non-agent laboratory.

**15. Training and Health Education. No change.**

**16. Add paragraph 16, Transportation (New paragraph)**

Items offered for shipment will be packaged and shipped in accordance with local, state, federal (EPA, DOT, FAA, other) shipping requirements IAW existing laws and regulations.

**END OF AMC Interim Guidance**